

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

CODY HANSEN,

Defendant.

Criminal Case No. 18-082-M

**UNITED STATES' RESPONSE IN OPPOSITION TO DEFENDANT'S REQUEST TO
RECONSIDER BAIL**

The United States opposes the defendant's request to reconsider bail. It does not appear that defendant consulted with the United State Probation Office (USPO) prior to seeking his admission into the Veteran's Affairs Program he seeks to attend. The input of the USPO is essential to determine the appropriateness of the program. At a bare minimum, some of the information needed for the United States to evaluate whether the program is appropriate for the defendant is: (1) is the program aware that the defendant is currently facing federal criminal charges stemming from his travel to Rhode Island in order to have sex with a 12 and 14 year old; (2) does the program accept individuals who are interested in having sexual relations with children; (3) what are the policies governing individuals who fail to comply with program guidelines and what is the process were defendant to be discharged early from the program; (4) is the facility locked; (5) what interaction will the defendant have with children, is he allowed visitors or contact with other patients' children; (6) what type of internet access will the defendant have at his disposal; (7) are residents granted off campus privileges and under what circumstances; and (8) what is the plan after the defendant is discharged.

Based on the above, because at this point the information regarding the treatment program to which defendant suggests he be released is not sufficiently developed, the United States respectfully requests that the Court deny his motion for bail.

Respectfully submitted,

UNITED STATES OF AMERICA
By its Attorney,

STEPHEN G. DAMBRUCH
United States Attorney

/s/ Dulce Donovan
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CERTIFICATE OF SERVICE

I, hereby certify that on this 8th of November, 2018, I caused the within United States' Response in Opposition to Defendant's Request to Reconsider Bail to be electronically filed with the United States District Court for the District of Rhode Island, using the CM/ECF System.

/s/ Dulce Donovan
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